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Public Comment
Affordable, Safe Drinking Water Initiative
Deadline: On-going

February 8, 2017



State Water Resources Control Board
Attn: Jeanine Townsend, Clerk of the Board
1001 I Street, 24th Floor
Sacramento, CA 95814

VIA EMAIL: commentletters@waterboards.ca.gov

Re: Comment Letter – Affordable, Safe Drinking Water Workshop.

Dear Ms. Townsend,

On behalf of Olivenhain Municipal Water District, thank you for the opportunity to provide the State Water Resources Control Board with input on the affordable, safe drinking water workshop. OMWD provides 84,000 customers in northern San Diego County with water, wastewater, recycled water, hydroelectric, and recreational services.

We appreciate the opportunity to provide feedback on the development of the statewide Low-Income Water Rate Assistance Program. Though the notice does not specifically mention the intent to propose a public goods charge, we wish to make our position on that subject known. We oppose funding this program through a public goods charge that establishes a statewide tax on water, effectively acting as a redistribution of wealth. Imposing a tax on water proportional to the user’s income does not take into consideration the differences in the cost of living throughout the state, nor the differences in cost associated with providing water across California’s communities, and ultimately adds further burden to ratepayers.

Instead, we implore the State Board to identify new funding for disadvantaged communities by engaging federal legislators to offer tax credits for low income households. Additionally, the State Board should continue working with these legislators to ensure adequate funding of the Environmental Protection Agency’s State Revolving Funds, which allows for distribution of funds by the State Board to affected districts demonstrating the greatest need. As another alternative, the State Board should consider seeking funds from the state’s general fund.

Focusing on these methods of financing, coupled with allowing local agencies to develop methods that appropriately reflect their area’s unique conditions, allows for a fair process to ensure every individual has access to safe and affordable drinking water. OMWD, for instance, has a tier-based pricing structure with a lifeline rate, with increases in rates associated with increased usage. This effectively allows all customers to have access to water for drinking, cooking, and sanitary purposes at a lower rate, while water used for non-essential purposes is charged at a higher rate to recover operating and maintenance costs.



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A Public Agency Providing Water Wastewater Services Recycled Water Hydroelectricity Elfin Forest Recreational Reserve

If you or your staff should need any additional details pertaining to this assessment, please do not hesitate to contact me at 760-753-6466.

Regards,

A handwritten signature in blue ink that reads "Kimberly A. Thorner". The signature is fluid and cursive, with the first name being the most prominent.

Kimberly A. Thorner
General Manager

CC: Kim Craig, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown, Jr.
Assemblywoman Marie Waldron
Assemblyman Rocky Chavez
Assemblyman Brian Maienschein
Assemblyman Todd Gloria
Senator Pat Bates
Senator Joel Anderson
Senator Toni Atkins
Mark Muir, Board Chairman, San Diego County Water Authority
Tom Howard, Executive Director, State Water Resources Control Board
Eric Oppenheimer, Chief Deputy Director, State Water Resources Control Board
Planning and Performance
Dave Bolland, Director of Regulatory Relations, Association of California Water Agencies